

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

**IN RE: VEHICLE TRACKING AND  
SECURITY SYSTEM ('844) PATENT  
LITIGATION**

**MDL NO. 11-2249**

**PJC LOGISTICS, LLC,**

**Plaintiff,**

**v.**

**ACT TRANSPORTATION, LLC,  
*et al.*,**

**Defendants.**

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**Case No. 0:11-cv-02552-DWF-SER**

(Transferred from District of Nevada; Civil  
Action No. 2:11-cv-00418-GMN-CWH)

**PLAINTIFF PJC LOGISTICS, LLC'S  
MOTION FOR DEFAULT JUDGMENT  
AGAINST DEFENDANT  
HENDRICKSON TRUCKING, INC.**

Plaintiff PJC Logistics, LLC ("PJC") moves, pursuant to Fed. R. Civ. P. 55(b)(2), for a default judgment against Defendant Hendrickson Trucking, Inc. ("Hendrickson Trucking"). Default judgment should be granted because Hendrickson Trucking has failed to answer PJC's complaint for patent infringement or otherwise appear in this action, and the clerk has entered a default against Hendrickson Trucking.

Based on Hendrickson's inaction and its willful infringement of U.S. Patent No. 5,223,844, Plaintiff PJC respectfully requests that this Court: (1) issue a default judgment in the amount of at least \$37,700.00, as well as any enhanced damages the Court deems appropriate; (2) award PJC the costs incurred in bringing this motion against Hendrickson in the amount of \$976.00; (3) award PJC attorneys' fees in the amount of \$9,931.50; (4) award PJC pre-judgment and post-judgment interest at a rate of 3.25%; and (5) award any other relief the Court deems just and proper.

This motion is supported by PJC's memorandum of law submitted herewith, the declaration of Steven R. Daniels, dated April 9, 2013, and all of the files, records, and proceedings herein.

Respectfully submitted,

Dated: April 9, 2013

/s/ Steven R. Daniels

Steven R. Daniels (Admitted *Pro Hac Vice*)

Texas Bar No. 24025318

FARNEY DANIELS PC

800 S. Austin Ave., Suite 200

Georgetown, TX 78626

Telephone: (512) 582-2828

Facsimile: (512) 582-2829

Email: sdaniels@farneydaniels.com

***Attorneys for Plaintiff***

***PJC Logistics, LLC***